

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

FILED IN OPEN COURT
U.S.D.C. - Atlanta
SEP 29 2022
By: KEVIN P. WEIMER, Clerk
Deputy Clerk

UNITED STATES OF AMERICA

v.

BRITTANY HUDSON

Criminal Information

No. 1:22-CR-362

THE UNITED STATES ATTORNEY CHARGES THAT:

Count One
(Conspiracy to Commit Wire Fraud)

1. Beginning on a date unknown, but from at least in or about January 2022, and continuing through in or about June 2022, in the Northern District of Georgia and elsewhere, the Defendant, BRITTANY HUDSON, did knowingly and willfully combine, conspire, confederate, agree, and have a tacit understanding with Kayricka Wortham a/k/a Kayricka Dupree a/k/a Kayricka Young and others known and unknown to commit wire fraud, that is, to knowingly devise and intend to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and by omission of material facts, and for the purpose of executing the scheme, with the intent to defraud, to cause the transmission of interstate wire communications, in violation of Title 18, United States, Code, Section 1343.

Background

At all times relevant to this Information:

2. Defendant HUDSON was in a relationship and resided with Kayricka Wortham a/k/a Kayricka Dupree a/k/a Kayricka Young. Defendant HUDSON owned a business, Legend Express LLC, which contracted with Amazon.com, Inc. ("Amazon") as a Delivery Service Partner. Amazon Delivery Service Partners are independent businesses that partner with Amazon to deliver packages to customers.

3. Kayricka Wortham a/k/a Kayricka Dupree a/k/a Kayricka Young was an Operations Manager at Amazon. She worked at the Amazon Warehouse in Smyrna, Georgia. In her position, Wortham supervised others and had the authority to approve new vendors for Amazon. She could also approve the payment of vendor invoices.

4. Demetrius Hines was a Loss Prevention Multi-Site Lead at Amazon. He worked at various Amazon sites, including the Amazon Warehouse in Smyrna, Georgia. In his position, Hines was responsible for preventing loss and protecting people, products, and information at Amazon. He led investigations, conducted interviews, and monitored security risks.

5. Amazon is an American multinational technology company whose business interests include e-commerce, cloud computing, digital streaming, and artificial intelligence. Amazon engages in the online retail sale of a wide range of products, including books, music, computers, and electronics, among numerous

other products, which are directly shipped to customers. Amazon is one of the largest technology companies in the United States.

Manner and Means

6. Wortham used her position as an Operations Manager at Amazon to steal more than \$9 million from the company. Working with co-conspirators, Wortham created fake vendors and submitted more than \$10 million in fictitious invoices for those vendors, causing Amazon to transfer approximately \$9.4 million to bank accounts controlled by her and her co-conspirators.

7. As part of the scheme, Wortham provided fake vendor information to unknowing subordinates and asked them to input the information into Amazon's vendor system. Once the information was entered, Wortham approved the fake vendors, thereby enabling those vendor accounts to submit invoices for payment for goods and services purportedly provided by the vendors to Amazon.

8. Wortham established the fake vendor accounts so that they were associated with bank accounts controlled by her and co-conspirators.

9. After the fake vendor accounts were established, Wortham and her co-conspirators submitted fictitious invoices to Amazon for payment. These invoices falsely represented that the fake vendors had provided goods and services to Amazon, when in fact they had not. The invoices directed payment to bank accounts controlled by Wortham and her co-conspirators.

10. After Amazon received the fictitious invoices, Wortham or others approved them for payment, causing Amazon to transfer funds to the bank accounts controlled by Wortham and her co-conspirators. These approvals and payments caused transmissions of interstate wire communications.

11. In furtherance of the conspiracy, Wortham recruited other individuals to act as purported vendor contacts for the fake vendors entered into Amazon's system. Wortham shared fraudulent proceeds with these co-conspirators by directing payments of fictitious invoices to their bank accounts and by transferring fraudulent proceeds from her accounts to theirs.

12. Conspiring with Wortham, Defendant HUDSON submitted fictitious invoices on behalf of some of the fake vendors and directed payment to bank accounts controlled by her and co-conspirators. Wortham or others approved the fictitious invoices submitted by Defendant HUDSON.

13. Wortham also recruited Hines and Conspirator 1, who was a Senior Human Resources Assistant at Amazon, into the scheme to establish additional fake vendor accounts after she began the fraudulent scheme. Hines and Conspirator 1 provided information to Wortham to create additional fake vendor accounts. Wortham or Conspirator 2, who was another Operations Manager at Amazon, approved these vendors for payment.

14. Wortham and Hines submitted fictitious invoices for these fake vendors for payment by Amazon. Wortham, Conspirator 2, or others approved these

invoices for payment, even though in truth the fake vendors provided no goods or services to Amazon.

15. Wortham, Defendant HUDSON, Hines, Conspirator 1, Conspirator 2, and others received fraudulent proceeds generated from these fake vendor accounts. The invoices directed payment to bank accounts controlled by them, and Wortham transferred fraudulent proceeds from her accounts to other co-conspirators' accounts.

16. After Wortham left Amazon in or about March 2022, she, Defendant HUDSON, and Hines continued to submit fictitious invoices to Amazon on behalf of the fake vendors they created. Conspirator 2 approved fictitious invoices after Wortham left Amazon. The conspirators continued to receive fraudulent proceeds from the scheme until in or about June 2022.

17. In total, Wortham and her co-conspirators submitted more than \$10 million in fraudulent invoices to Amazon as part of this scheme. The conspirators spent the fraudulent proceeds on themselves, including purchasing real estate, luxury cars, and expensive jewelry.

All in violation of Title 18, United States Code, Section 1349.

Forfeiture Provision

18. Upon conviction of the offense alleged in this Information, the Defendant, BRITTANY HUDSON shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(2), any property constituting, or

derived from, proceeds obtained directly or indirectly, as a result of said violations, including, but not limited to, the following:

- a. MONEY JUDGMENT: A sum of money in United States currency, representing the amount of proceeds obtained as a result of the offense alleged in this Information.

19. If, as a result of any act or omission of the Defendant, any property subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

the United States of America intends, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c) and

Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other property of the Defendant up to the value of the forfeitable property.

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